

UNITED STATES BANKRUPTCY COURT

EASTERN DISTRICT OF CALIFORNIA

OFFICE OF THE CLERK

FILED

FEB 26 2018

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA

In Re:

Southern Inyo Healthcare District

Case No.:

16-10015-A-9

TJOF

To Whom it May Concern:

Attached is a copy of the Request for Payment of Administrative Expense filed by you without a separate Notice of Hearing.

Pursuant to 11 U.S.C. § 503(b), administrative expenses shall be allowed after "notice and hearing." **NOTICE IS HEREBY GIVEN** that the court will take no action concerning your Request for Payment of Administrative Expense until you comply with the "notice and hearing" requirement of § 503(b). Pursuant to Local Rule 9014-1, this matter will be calendared **only** upon receipt of a Notice of Hearing, with date, time, place and department filled in. Please submit a copy of the previously filed Request for Payment of Administrative Expense with your Notice of Hearing.

Clerk's Office staff is precluded by law from giving legal advice. Legal questions should therefore be directed to competent legal counsel.

Dated: 2-26-18

FOR THE COURT

WAYNE BLACKWELDER, CLERK

By: Deputy Clerk, United States Bankruptcy Court
Fresno Division, (559) 499-5800**Mailing Address:**United States Bankruptcy Court
2500 Tulare Street, Suite 2501
Fresno, CA 93721

cc: Case File

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UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF CALIFORNIA, FRESNO DIVISION

In re:
 SOUTHERN INYO HEALTHCARE
 DISTRICT,
 Debtor.

Case No.: 16-10015-A-9

Chapter 9

Doc. No. KDG-1

Date: To Be Scheduled
 Time: To Be Scheduled
 Place: Dept. A, Courtroom 11
 U.S. Bankruptcy Court
 2500 Tulare St.
 Fresno, CA 93721

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1 **REQUEST FOR PAYMENT OF ADMINISTRATIVE EXPENSE CLAIM OF**
2 **HEALTHCARE CONGLOMERATE ASSOCIATES, LLC ARISING OUT OF**
3 **REJECTION OF EXECUTORY CONTRACT (11 U.S.C. §§ 503(b) AND 507(a)(2))**

4 NOTICE IS HEREBY GIVEN that HEALTHCARE CONGLOMERATE ASSOCIATES,
5 LLC ("HCCA") hereby asserts an Administrative Expense Claim (the "Claim") in the total
6 amount of \$2,524,054.00, pursuant to 11 U.S.C. §§ 503(b) and 507(a) (2), and represents the
7 following:

8 1. This claim arises out of the rejection of that certain Management Services
9 Agreement ("MSA") dated sometime in January of 2016, between HCCA and Southern Inyo
10 Healthcare District (the "Debtor"). A copy of the MSA is attached hereto as Exhibit "A" and
11 incorporated herein by reference.

12 2. On December 2, 2017, the Court made its *Order Approving Stipulation Re*
13 *Rejection of HCCA Management Agreement* [Dkt. No. 382] (the "Rejection Order"). The
14 Rejection Order approved that certain *Stipulation Re Rejection of HCCA Management Agreement*
15 [Dkt. No. 377], which specifically preserved HCCA's right to contest allegations made in the
16 *Debtor's Emergency Motion (I) for Authority to Immediately Terminate HCCA Management*
17 *Agreement* [Dkt. No. 325], including the Debtor's allegations that the MSA is a prepetition
18 contract.

19 3. The Rejection Order further provided that, Pursuant to Rule 3002(c)(4) of the
20 Federal Rules of Bankruptcy Procedure, HCCA shall file any claim arising from this rejection,
21 including, but not limited to any claim or demand seeking administrative expense payments, no
22 later than **January 31, 2018.**" (Rejection Order, Par. D).

23 4. The Claim is based upon the following items:

24 Unpaid Management Fees (See, Exh. B)	\$1,184,730.00
25 Unpaid Travel Expenses (See, Exh. C)	\$137,850.00
26 MSA Term. Fee Before Interest (See, Exh. D)	\$1,201,474.00
27 TOTAL	\$2,524,054.00

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Filed 01/30/18

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1 5. Claimant reserves the right to amend this Claim and will set the matter for hearing
2 at a future date.

3
4 Dated: January 30, 2018

KLEIN, DENATALE, GOLDNER, COOPER,
ROSENLIEB & KIMBALL LLP AND ORRICK,
HERRINGTON & SUTCLIFFE LLP

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6
7 By: 

HAGOP T. BEDOYAN

Attorneys for Healthcare Conglomerate
Associates, LLC

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